

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

MONTGOMERY COUNTY, PENNSYLVANIA,
RECORDER OF DEEDS, by and through NANCY
J. BECKER, in her official capacity as the Recorder
of Deeds of Montgomery County, Pennsylvania, on
its own behalf and on behalf of all others similarly
situated,

Plaintiff,

v.

MERSCORP, INC., and MORTGAGE
ELECTRONIC REGISTRATION SYSTEMS,
INC.,

Defendants.

CIVIL ACTION

NO. 11-6968

**PLAINTIFF'S MOTION TO UNSEAL REPORT
OF MARIE MCDONNELL AND FOR RELATED RELIEF**

Plaintiff respectfully moves for the following relief: (1) to remove this case from its current suspense status for the limited purpose of adjudicating the balance of this motion; (2) to unseal the analysis by Marie McDonnell of the Farkas loan (redacted version filed at Docket 81-30) upon which this Court relied in its July 1, 2014 summary judgment adjudication that is currently on appeal; and (3) to expedite briefing on this motion (because Ms. Becker's brief is due in the Third Circuit on March 16, 2015) so that MERS' response to this motion is due in seven days (by Friday, February 20, 2015) and Ms. Becker's reply is due three business days later, by Wednesday, February 25, 2015. The grounds for this motion are set forth in the accompanying memorandum and attached exhibits. Proposed forms of Order are attached to this motion.

Dated: February 13, 2015

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CERTIFICATE OF SERVICE

This motion, its supporting memorandum, and annexed exhibits, were served upon all counsel of record through the Court's ECF System. The exhibits that are confidential and filed under seal were separately served by email to all counsel this date, February 13, 2015.

/s/ Robert J. LaRocca

Robert J. LaRocca